

Commonwealth of Kentucky
Division for Air Quality
RESPONSE TO COMMENTS

ON THE TITLE V DRAFT PERMIT V-04-019
Kimberly-Clark Corporation, Owensboro Operations
601 Innovative Way
Owensboro, KY 42301
April 11, 2005
Massoud Kayvanjah, Reviewer
Plant I.D. # 21-159-00169
Application Log # 52848, AI# 917

SOURCE DESCRIPTION:

This facility is a non-integrated tissue paper manufacturing mill and uses on-site deinked secondary paper fibers. The mill is not a pulp mill and does not use chlorine compounds to bleach the secondary fibers, which excludes the facility from applicability of 40 CFR 63.440 and 63.445. The facility is a major source of criteria air pollutant (CO and NO_x), and is currently a minor source of hazardous air pollutant (Acrylamide). The Title V application for this source was submitted in October 15th, 1999.

PUBLIC AND U.S. EPA REVIEW:

On January 19, 2005, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in *MESSENGER-INQUIRER* in Owensboro, Kentucky. The public comment period expired 30 days from the date of publication.

Comment received:

Comments were received from Kimberly-Clark on February 17, 2005. Attachment A to this document lists the comments received and the Division's response to each comment. Minor changes were made to the permit as a result of the comments received, however, in no case were any emissions standards, or any monitoring, recordkeeping or reporting requirements relaxed. Please see Attachment A for a detailed explanation of the changes made to the permit. The U.S. EPA has 45 days to comment on this proposed permit.

ATTACHMENT A

Response to Comments

Comments on Kimberly-Clark Corporation, Draft Title V Permit reviewed by Massoud Kayvanjah.

Cover Sheet

Please make applicable modification to the facilities name and address in order to reflect the facilities legal name. Reference Form #DEP7007AI.

Division's response: The Division received the facility's DEP7007AI Form on February 23, 2005, and changed of the facility's name from Kimberly-Clark Tissue Company to Kimberly-Clark Corporation, Owensboro Operations and changed of the address from Murphy Road, US 60, Newman, KY 42301 to 601 Innovative Way, Owensboro, KY 42301.

Title V Permit

Page 5 – Section B.02.2.i (Compliance Demonstration Method)

Please modify this condition in order to properly identify the intended emissions point:

The affected facility is considered to be in compliance with the particulate emission limit as long as the dryer exhaust system (SN-04) is operational at all times.

Deleted: vacuum vent

Deleted: also

Division's response: The Division concurs with the comment and has revised the permit as suggested by the source.

Page 6 – B.02.4.a (Specific Monitoring Requirements)

Please modify this condition in order to identify the intended records for retention.

The total monthly (each calendar month) fuel usage of the dryers, and tonnage of dried paper.

Deleted: per hour and per month

Division's response: The Division concurs with the comment and has revised the permit as suggested by the source.

Page 8 - B.03.4.ii. (Specific Monitoring Requirements)

Please remove this condition in its entirety as weak acids used in the bleaching process do not contribute or cause an acidic pH as is exhibited in the following record.

30 day pH of RF Stock (feed)

Average: 7.77
Minimum: 6.43
Maximum: 8.73

30 Day pH of TM1 Whitewater (recycle)

Average: 8.02
Minimum: 7.76
Maximum: 8.36

Deleted: Water pH balance (Since weak acids are used for bleaching the paper).

Division's response: The Division concurs with the comment and has revised the permit as suggested by the source.

Page 8 - B.03.4.iii. (Specific Monitoring Requirements)

Please modify this condition in order to identify the intended flow for records retention.

Water Flow rate through the scrubber.

Division's response: The Division has revised the permit as requested by the source and added

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the word “Water” to the line before the “Flow rate through the scrubber”, and added the word Air to the line “Pressure drop across the scrubber’s collector”.

Page 9 – B.04.2.i. (Compliance Demonstration Method)

Please modify this condition in order to identify the intended emissions point.

The affected facility is considered to be in compliance with the particulate emission limit as long as the air dryer exhausts systems are (SN-01/SN-03) operational at all times.

Deleted: vacuum vent is also

Division’s response: The Division has revised the permit as requested by the source.

Page 10 – B.04.4a. (Specific Monitoring Requirements)

Please modify this condition in order to identify the intended records for retention.

The total monthly (each calendar month) fuel usage of the dryers, and tonnage of dried paper,

Deleted: per hour and per month.

Division’s response: The Division has revised the permit as requested by the source.

Page 11 – B.05.1. (Operating Limitations)

Please modify this condition in order to reflect the functional use of this equipment.

To preclude a PSD review under requirements of 401 KAR 51:017, the Vacuum Thread-up Roll and associated dust separator (SN-51) shall be operated any time the Winder Reel is in thread-up mode.

Deleted: Threading Vacuum Vent with

Deleted: paper reel for the threading process is in operation

Division’s response: The Division has revised the above Operating Limitations to the following: Refer to item 2, Emission Limitation and Compliance Demonstration Method.

Page 11 – B.05.i. (Compliance Demonstration Method)

Please change this condition in order to reflect the functional use of this equipment.

The affected facility is considered to be in compliance with particulate emission limit as long as the Vacuum Thread-up Roll and associated Vacuum Thread-up Roll dust separator is operational any time the Winder Reel is in the thread-up mode.

Deleted: vacuum vent

Deleted: also

Deleted: at all time.

Division’s response: The Division has revised the permit as requested by the source.

Page 12 – B.05.4.b. (Specific Monitoring Equipment)

Please remove this condition in its entirety as the winder reel cannot be threaded unless the vacuum thread up roll is in use. Conditionally the vacuum thread-up roll cannot be in use during normal operation or it would break the sheet from the winder reel.

Deleted: ¶
The monthly hours of operation (hours operated per month) of the vacuum vent

Division’s response: The Division has revised the permit as requested by the source.

Page 13 – B.06.1. (Operating Limitations)

Please remove the portion of this condition which refers to the Mix Blend Forming Fiber (proper name: Multi Back Facial Folder) as this system is a 100% closed loop system with no venting or emissions possible to the atmosphere.

To preclude a PSD review under requirements of 401 KAR 51:017, a Torit Dust Removal system (SN-11) on eight (8) converting lines shall be operated any time the converting lines are in operation.

Deleted: , and the ninth converting line (Mix Blend Forming Fiber) with its own dust removal system s

Deleted: ¶

Deleted: for the cutting and packaging process are

Division's response: Per the permit application's forms DEP7007V (Applicable requirements), DEP7007N (Stack parameters, Emissions, and Pollution Control equipment), and DEP7007W (Emissions Comparisons) with the corresponding diagrams of the Converting Lines (Emission point SN-11) The Torit Dust removal system has been identified as the "Control Equipment" of this unit. Kimberly-Clark Corporation may submit the required forms and the corrected diagram for a permit revision.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.